

Message

From: DeWitt, Lisa [lidewitt@mt.gov]
Sent: 7/1/2016 9:41:59 PM
To: Hoogerheide, Roger [Hoogerheide.Roger@epa.gov]; Cirian, Mike [Cirian.Mike@epa.gov]; Owen, Colleen [COwen@mt.gov]
CC: repinedl@cdmsmith.com; Vranka, Joe [vranka.joe@epa.gov]
Subject: RE: CFAC_SAP Addendum comments
Attachments: Un-named Channel (3).jpg

This includes the photo referred to in Comment 1.

From: DeWitt, Lisa
Sent: Friday, July 01, 2016 3:40 PM
To: 'Hoogerheide, Roger'; Cirian, Mike; Owen, Colleen
Cc: repinedl@cdmsmith.com; Vranka, Joe
Subject: RE: CFAC_SAP Addendum comments

Below are DEQ's draft comments on the CFAC_SAP Addendum

1. Page 5, Section 2.2.1, Surface Water Features. During a May 26, 2016 site visit, DEQ noted an un-named stream channel (see attached photo). Please include collection of surface water as well as sediment samples from this waterway. Please also GPS the location of this stream channel and include its location and any pertinent features on future site maps.
2. Page 7, Section 2.2.1.3, Flathead River. DEQ notes that the streambank stabilization work project discussed could impact sediment and surface water samples collected along this area of the Flathead River, and thus call into question the usability of this information. Please include the location of the area impacted on a site figure, and describe the measures that will be taken to mitigate this potential impact on sediment samples and results.
3. Page 15, Section 2.2.4.4, Fueling Area. While the tanks themselves may be the responsibility of Calbag, this document should address how any potential contamination resulting from the tanks (i.e., from possible leaks or spills) will be identified. Please include a description of the sampling to be conducted to address this.
4. Page 19 and 20, Section 2.3.1, Historical Production Well Sampling. If the production wells are not going to be sampled, why are the results provided? DEQ recommends deleting 2.3.1.
5. Page 21, Section 2.4, first bullet. Please include the number that required clearing.
6. Page 22, Section 2.5.1, Drainage Structure Sampling. Please specify that the samples collected were soil samples. Please include the rationale for the four of the thirteen drainage structures that were sampled.
7. Page 23, Section 2.5.2, Selection of Drainage Structure Drilling Locations. Please describe the criteria that were used to select the drilling locations.
8. Page 24, Section 2.6.1, Field Screening of Landfill Soil Gas. Last paragraph. Please specify, either in the text or on a figure, which probes were installed manually and which were installed using the geoprobe.
9. Page 33, Section 3.6, Surface Water Sampling. See comment 1 above.
10. Page 34, Section 3.7, Sediment Sampling. See comment 1 above.

Happy 4th everyone!

--Lisa

From: Hoogerheide, Roger [<mailto:Hoogerheide.Roger@epa.gov>]
Sent: Friday, July 01, 2016 9:26 AM
To: Cirian, Mike
Cc: repinedl@cdmsmith.com; DeWitt, Lisa; Vranka, Joe
Subject: RE: CFAC_SAP Addendum comments

My comments are below:

General Comments

In multiple locations in Section 2.0 it is noted that noxious weeds were observed. Although the site is only in the RI phase, control of noxious weeds will be identified as an ARAR during the FS and carried forward through to ROD. It is recommended that CFAC consider adopting a robust weed management program to reduce efforts to eliminate noxious weeds as part of future site O&M.

Specific Comments

Page 6, Section 2.2.1.2, 2nd paragraph – The Site reconnaissance noted that vegetation was observed in the Cedar Creek Reservoir Overflow Ditch. Although flow in the overflow ditch this year was atypical, vegetation in the ditch may cause debris to be obstructed and pooling of water. Please conduct another reconnaissance of the ditch at the end of the growing season and ensure that all perennial and annual vegetative growth be cleared from the ditch.

Page 7, Section 2.2.1.3, 1st paragraph – If CFAC is hiring an engineering firm to conduct a bank stabilization project on the north side of the Flathead River, this has a high probability of impacting the usability of any sediment data collected along the north side of the river prior to the stabilization project as well as impacting accessibility to sample monitoring locations in the future. Any figures produced showing the locations where pore water and sediment will be collected in Flathead River should also show the locations where bank stabilization work is proposed.

Page 15, Section 2.2.4.4 – Consider adding TPHs-DROs to Table 6 and provide a discussion for sampling of these COPCs in Section 3.0 to allow for opportunistic sampling of the soils around the USTS if there is a possibility that Calbag may remove the USTs during Phase 1.

Pages 19-20, Section 2.3.1 – In Section 2.3, it is stated that no sampling of the production wells will take place. Therefore, the presentation of historical data should not be included in the SAP addendum. If this historical data is important for future decision making, please submit this data as a separate technical memorandum that can be placed in the site file.

Page 20, Section 2.4 first paragraph – Please note that field datasheets are included in Appendix G.

Page 20, Section 2.4 general observations - Areas being investigated between rectifier yard and Flathead Lake may require coordination with BNSF Railway given that trains could be parked on the track limiting access.

Page 21, Section 2.5, 1st paragraph – Please go into greater detail about how depth was gauged and how the presence of water was assessed. Also, please note that field datasheets are included in Appendix G.

Page 23, Section 2.5.1, page 23, third bullet. Please break out PAH as a separate bullet and evaluate both carcinogenic/possible carcinogenic PAHs and non-carcinogenic PAHs against screening levels.

Page 23, Section 2.5.2 – Since PAHs (i.e. naphthalene) and TPHs-DROs can also be detected by smell, please include olfactory impacts as another field indicator.

Page 27, Section 2.7, last paragraph – please change date from June to July for when the final summary report will be received.

Page 28, Section 3.1, 1st paragraph – The correspondence from Roux to USEPA discussed in the 3rd sentence should be referenced.

Page 29, Section 3.1, last paragraph – Olfactory observations are just as good as visual observations at determining evidence of petroleum impacts and should be noted. It is also noted that the language specifies that soils will be screened in the field for petroleum impacts, yet TPHs-DROs are not being analyzed for to verify the presence of petroleum impacts detected in the field.

Page 30, Section 3.2 2nd paragraph – After this draft SAP addendum was submitted, Roux and the Agencies agreed to use a field modification form. Please include this as an additional way to communicate changes in the last sentence. USEPA also provided template language discussing the use of the field modification form. Please include this language written specifically for the CFAC Site somewhere in Section 3.0 and include the field modification form as an appendix to this SAP addendum.

Page 30, Section 3.2 3rd paragraph – Given the presence of PCE in the Former Drum Storage Area, it is recommended that a field technician split the coring and run a PID down the core to identify potential locations where PCE may be pooled in the coring in order to take depth discrete samples rather than a composite of the coring. Field dye methods are also available to evaluate soil samples collected during the drilling activities for chlorinated solvents. Please review the soil sampling SOP to determine if the SOP needs to be revised to allow for more flexibility in using additional field methods to detect for the presence of PCE and submit a revised SOP as part of the final SAP addendum if it is revised.

Page 31, Section 3.3, 2nd paragraph last sentence – With the use of a field modification form to document field changes, please revise the last sentence.

Pages 31 – 32, Section 3.4 – If the proposed construction details used by Cascade Drilling are different than the well installation SOP submitted in the SAP, please provide a revised SOP in this addendum.

Page 35, Section 3.7.2, 1st paragraph – Any proposed sediment sampling locations should also be evaluated in light of the upcoming bank stabilization work that is proposed by CFAC.

Page 35, Section 3.7.2, last paragraph – With the use of a field modification form to document field changes, please revise the last sentence of the last paragraph.